

# Wyoming Department of Agriculture

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*The Wyoming Department of Agriculture is dedicated to the promotion and enhancement of Wyoming's agriculture, natural resources and quality of life*



Wyoming Department of Agriculture

March 16, 2009

Animal and Plant Health Inspection Service  
Plant Protection and Quarantine  
5353 Yellowstone Rd.  
Suite 208  
Cheyenne, WY 82009

Dear Animal and Plant Health Inspection Service:

Following are the comments from the Wyoming Department of Agriculture (WDA) on the draft Environmental Assessment (EA) for Rangeland Grasshopper and Mormon Cricket Suppression Program.

Our comments are specific to our mission within state government: dedicated to the promotion and enhancement of Wyoming's agriculture, natural resources, and quality of life. As this proposal has major impacts upon our agriculture industry, our natural resources and the welfare of our citizens, we believe it is important you continue to inform us of proposed actions and decisions and provide us the opportunity to express pertinent issues and concerns.

The WDA supports the control of grasshoppers and Mormon crickets when infestations exceed a predetermined threshold to preserve forage for livestock and wildlife. We will support landowners with crops impacted by grasshoppers and crickets, as well as the owners of honey and alfalfa leafcutter bees. Additionally we support the proper use of chemicals according to label and manufacturer recommendations. We have reviewed the draft EA and recommend Alternative C: Reduced Agent Area Treatments (RATTs). We offer the following comments to support Alternative C, to enhance or guide the Animal Plant Health Inspection Service (APHIS) in the process.

## **Update Section III. Affected Environment**

The draft EA describes the affected environment where APHIS applies pesticides to control grasshoppers and crickets. We believe APHIS should update their EA background information in two important areas related to agriculture.

1) Data for cropland estimates in the EA are outdated. Changes in demand for crops used in biofuels have changed acreage data dramatically in the past two years. There are also increases in acres of specialty crops important to Wyoming agriculture including fruit trees, berries and grapes, all of which are pollinated by bees. We recommend using Wyoming Agricultural Statistics data from 2007 or possibly 2008.

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2) APHIS provides background information from the WDA regarding domestic bee apiaries. "Approximately 170 apiarists operating 48,000 colonies are registered with the Wyoming Department of Agriculture for 2003." Due to the annual inspection by WDA staff, we strongly urge APHIS contact our office to have the most recent number of registered honey bees operated by traditional apiarists and alfalfa leafcutter bees prior to the implementation of this EA. Staff members are currently working with the apiarists to locate their hives using Global Positioning System (GPS); and believe this will provide a more accurate location for APHIS and Weed and Pest Districts to use when spraying.

**Revise B. Other Considerations, Section 2. Non-target Species**

As mentioned above, the WDA works closely with apiarists in Wyoming. We recommend APHIS contact the WDA for the most current information for location of active hives. APHIS stated "Beekeepers will be advised to move their bees at least two miles from the spray block boundaries." WDA staff does not recommend the movement of hives once in place for the pollination season. We have a number of concerns regarding the movement of hives and process which APHIS uses to notify apiarists, all of which we request APHIS includes in the EA:

- 1) Provide adequate notification of intention to spray within two miles of the hives. We recommend not less than two weeks.
- 2) Develop documented contact list regarding notifications and whether apiarists will move hives, have moved hives since notification or opted to not move hives.
- 3) Provide re-entry times to all apiarists who have moved hives. Notify all apiarists of their ability to replace hives in original location.
- 4) Keep records of registered, non-active hives to avoid not spraying fields where hives are no longer active, simply based on aerial visual location.

The WDA will agree to notify all registered, non-active hive owners to write a letter to APHIS regarding their inactivity and permission to spray in the immediate area where non-active hives are stored.

**Proceed with Alternative C: RATTs**

We support Alternative C as it uses less chemical, considers the importance of providing insects for wildlife such as sage grouse and is likely the most cost effective. We urge APHIS to develop thresholds of grasshopper and Mormon cricket populations for their agency as well as Weed and Pest Districts, agricultural producers and other interested parties. The consistency of a threshold, for example 50 grasshoppers per square yard, will create a more consistent protocol of when to treat a given area.

We also request developing a minimum or maximum swath size. The EA fails to clarify how many acres APHIS will treat in a given area. While APHIS developed buffers near ponds, lakes and streams, we also request a buffer apply towards stock tanks. APHIS clearly conveys the negative impacts to aquatic insects and fish due to chemical application to open water, but fails to clarify the negative impacts, including symptoms to wildlife and livestock from chemical treatment of areas with stock tanks or ponds.

The WDA thanks APHIS for receiving our comments. We look forward to reviewing the final EA and to the implementation of this program onto the farm and ranchlands across Wyoming.

Sincerely,



John Etchepare  
Director

JE/jw

Cc: Governor's Planning Office  
WDA Board of Agriculture  
Wyoming Stock Growers Association  
Wyoming Wool Growers Association  
Rocky Mountain Farmers Union  
Wyoming Association of Conservation Districts  
Wyoming Farm Bureau Federation  
Wyoming State Grazing Board  
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US Fish and Wildlife Service Cheyenne office  
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Weed and Pest Council  
Wyoming Beekeepers Association